

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
GREENBELT DIVISION**

**In Re:**

**CASE NO. 15-10795-PM**

**HYACINTH BEVERLY MORGAN,**

**CHAPTER 13**

**DEBTOR.**

**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

**COMES NOW**, U.S. Bank National Association, as Trustee for Stanwich Mortgage Loan Trust, Series 2012-9 , by Counsel, and objects to the Confirmation of the Chapter 13 Plan and in support thereof, represents unto the Court:

1. U.S. Bank National Association, as Trustee for Stanwich Mortgage Loan Trust, Series 2012-9 ("Secured Creditor") is a secured creditor of the debtor herein by virtue of the Note and accompanying Deed of Trust on the property located at 2505 Eccleston St., Silver Spring, MD 20902-4801.

2. The pre-petition arrearages due to U.S. Bank National Association, as Trustee for Stanwich Mortgage Loan Trust, Series 2012-9 are \$131,486.60.

3. The Plan is underfunded, as the arrearages owed to this Secured Creditor are understated, with the Plan providing for \$0.00 in pre-petition arrearages.

4. Any Chapter 13 Plan proposed by Debtor must provide for and eliminate the objections specified above in order to be feasible and to provide adequate protection to this objecting secured Creditor. It is respectfully requested that this Court deny confirmation of the Chapter 13 Plan as proposed by Debtor.

**WHEREFORE**, the undersigned requests as follows:

- (1) That confirmation of the proposed Chapter 13 Plan be denied;
- (2) For such other relief as this Court deems proper.

U.S. Bank National Association, as Trustee for  
Stanwich Mortgage Loan Trust, Series 2012-9

By: **/s/ Randa S. Azzam**

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Objection was served by first class mail postage prepaid or email this 1st day of April, 2015 on all necessary parties including Nancy Spencer Grigsby, Trustee, 4201 Mitchellville Road Suite 401, Bowie, MD 20716; Steven E. Mirsky, Counsel for Debtor, 1401 Rockville Pike, Suite 650, Rockville, MD 20852; and Hyacinth Beverly Morgan, Debtor, PO Box 2895, Silver Spring, MD 20915.

**/s/ Randa S. Azzam**

Randa S. Azzam, Esquire  
Samuel I. White, P. C.